

1 TOMIO B. NARITA (SBN 156576)
2 JEFFREY A. TOPOR (SBN 195545)
3 SIMMONDS & NARITA LLP
4 44 Montgomery Street, Suite 3010
5 San Francisco, CA 94104-4816
6 Telephone: (415) 283-1000
7 Facsimile: (415) 352-2625
8 tnarita@snllp.com
9 jtopor@snllp.com

10 Attorneys for defendant
11 Asset Acceptance, LLC

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA

15 JOHNNY WANG, an individual, on
16 his own behalf and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 vs.

20 ASSET ACCEPTANCE, LLC, and
21 TRANS UNION, LLC, Delaware
22 limited liability companies, and DOES
23 1-100, inclusive,

24 Defendants.
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CASE NO.: C09-04797 SI

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S
JULY 15, 2011 MOTION TO
COMPEL (DOC. NO. 126)**

1 WHEREAS on July 14, 2011, Plaintiff filed his Motion to Compel defendant
2 Asset Acceptance, LLC ("Asset") to produce certain documents relating to a
3 Federal Trade Commission investigation (Docket No. 126) ("the FTC motion");

4 WHEREAS on July 15, 2011, Plaintiff filed his Motion to Compel defendant
5 Asset Acceptance, LLC to produce certain documents relating to him, his debt, and
6 information that Asset furnished to credit reporting agencies (Docket No. 127)
7 ("the Credit Reporting motion");

8 WHEREAS Asset's response to Plaintiff's FTC motion is due on July 21,
9 2011, and its response to Plaintiff's Credit Reporting motion is due on July 22,
10 2011, pursuant to the Court's Standing Order;

11 WHEREAS Asset's counsel were attending and presenting at a professional
12 conference in Dallas, Texas from July 13, 2011 through July 15, 2011, when
13 Plaintiff filed his motions;

14 WHEREAS Asset's counsel were preparing on July 18, 2011 for a mediation
15 on July 19, 2011 before the Honorable Edward Infante (Ret.), and Asset's lead
16 counsel attended the mediation on July 19, 2011;

17 WHEREAS Asset requires a brief extension of time to prepare and file its
18 opposition to Plaintiff's FTC motion (Docket No. 126); and,

19 WHEREAS this stipulation shall not be, or be deemed to be, a waiver of any
20 argument or position regarding the substantive merits of the FTC motion or
21 Plaintiff's view of the urgency of the Credit Reporting motion;

22 THEREFORE, IT IS HEREBY STIPULATED between Plaintiff and Asset,
23 through their counsel of record, to request that the Court extend the deadline for
24 Asset to file its opposition to Plaintiff's FTC motion (Docket No. 126) until July
25 26, 2011.

26 SO STIPULATED.

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1 Dated: July 21, 2011

PRESTON LAW OFFICES
ETHAN PRESTON

2
3 By: s/Ethan Preston
4 Ethan Preston
5 Attorneys for plaintiff
Johnny Wang

6 Dated: July 21, 2011

SIMMONDS & NARITA LLP
TOMIO B. NARITA
JEFFREY A. TOPOR

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9 By: s/Jeffrey A. Topor
10 Jeffrey A. Topor
11 Attorneys for defendant
Asset Acceptance, LLC

12
13 **[PROPOSED] ORDER**

14 Pursuant to the stipulation of the parties and good cause appearing, IT IS
15 HEREBY ORDERED THAT:

16 The deadline for defendant Asset Acceptance, LLC to file its opposition to
17 Plaintiff's Motion to Compel (Docket No. 126) is continued to July 26, 2011.

18
19 DATED: 7/21/11

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21 By: _____

22 Hon. Susan Illston
23 United States District Judge
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